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Heather Dorbeck  
Committee Clerk  
Michigan Senate Regulatory Reform Committee

To the members of the committee:

In the matter of SB 963 I wish to express my concern over what appears to be a lack of input and review from the electrical industry, and a few elements that appear to have been overlooked in consolidating the various previous Public Acts into the current bill as proposed. While I have no objection to the formulation of a new Act to aggregate all of the various skilled trades licenses into a more accessible document, I am opposed to the changes that have apparently been made during this process relative to the initial qualifications for electrical inspectors and the continuing education requirements for electrical license holders.

There seems to be no requirement in the proposed legislation that requires an electrical inspector to also be an electrical license holder. I believe that this approach is ill-advised. Under the system that we have had for many years, the requirement for electrical code inspectors to already hold a Michigan Journeyman or Master Electrician license has served the public, building owners, electrical contractors and local municipalities quite well. Unlike some other states, our system has virtually guaranteed at least some level of proficiency in that the inspector, having had to pass the licensing exam and having accumulated the prerequisite field experience in order to do so, has demonstrated a working familiarity with the practices of the trade, and more importantly, the content and application of the Electrical Code. The bill as submitted appears to do away with this provision and can only serve to reduce the base of knowledge in the inspection community, which is likely to create problems for all parties involved.

In the matter of no longer requiring ongoing "update" training on the electrical Code whenever a new version is adopted, I believe that this is also a move in the wrong direction. Although such training has not always been appreciated, it has at least provided a framework by which all participants in the electrical industry can be periodically re-synchronized in order to more easily incorporate the provisions of the new Code at all professional levels. Making all parties aware of significant changes within the Code helps to simplify the permitting, building, and inspection process and ultimately helps to reduce cost and inconvenience for customers, and for the government. I find it odd that while the bill seems to still require this training for plumbers, it is absent for electricians, whose trade is arguably much more changeable and technical by its very nature. Requiring ongoing code update training makes sense, given the rapid pace of technological change within the electrical industry, and should therefore be retained.

Sincerely,



Thomas Bowes  
State of Michigan Licensed Electrical Journeyman